



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2557

DATE SCANNED 2/13/13

SCANNER NO. 2

SCAN OPERATOR EE5

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION  
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2012 SEP 11 PM 1: 12

September 11, 2012

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer  
Staff Director

FROM: Patricia C. Orrock  
Chief Compliance Officer

Debbie Chacona  
Assistant Staff Director  
Reports Analysis Division

BY: Jodi Winship/Sari Pickerall  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2012 July Quarterly Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2012 July Quarterly Report in accordance with 2 U.S.C. 434(a). The 2012 July Quarterly Report was due on July 15, 2012.

The committees listed in the attached RTB Circulation Report either failed to file the report, no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission  
Reason to Believe Circulation Report  
2012 JULY QUARTERLY Not Election Sensitive 07/15/2012 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2538	C00506295	BICKNELL FOR CONGRESS	BICKNELL, HUNTER	JAMES R. SHAW, JR.	\$121,335	0	8/3/2012	19	\$34,201	\$580
2539	C00020453	CASS COUNTY REPUBLICAN CENTRAL COMMITTEE		TONY P. KEY	\$100,231	1	8/9/2012	25	\$8,064	\$225
2540	C00511311	DAVE SITTON FOR CONGRESS	SITTON, DAVE	DAVID KATSEL	\$403,582	0		Not Filed	\$403,582 (est)	\$9,900
2541	C00500173	DAVID MCINTOSH FOR INDIANA	MCINTOSH, DAVID MARTIN	JACKIE M. BENNETT, JR.	\$1,733,077	0	7/31/2012	16	\$575,917	\$6,580
2542	C00501072	DEAN YOUNG FOR CONGRESS COMMITTEE	YOUNG, LARRY DEAN JR	HUGH R. PARQUE	\$468,916	0		Not Filed	\$117,229 (est)	\$4,950
2543	C00505628	FRIENDS OF CHRIS GARNER	GARNER, CHRISTOPHER JOHN	BARBARA S. SMALL	\$120,085	0		Not Filed	\$120,085 (est)	\$4,950
2544	C00495119	FRIENDS OF HEATHER MCIEER	MCIEER, HEATHER	MERCIDEES MCIEER	\$671,360	0		Not Filed	\$134,272 (est)	\$4,950

2547	C00497644	JIMMIE MOORE FOR CONGRESS	MOORE, JIMMIE SEE	GAIL A. CHINN-PRATT	\$328,232	0		Not Filed	\$82,058 (est)	\$3,850
2548	C00500827	JOHN LEE FOR CONGRESS	LEE, JOHN JAY	RYANN PATRICK-SHELL	\$138,309	0		Not Filed	\$46,103 (est)	\$990
2549	C00514489	KENNETH SANDERS FOR CONGRESS CAMPAIGN	SANDERS, KENNETH	JUDEN ESQUE SANDERS, JR	\$156,338	0		Not Filed	\$52,113 (est)	\$2,970
2551	C00293100	NAADAC THE ASSOCIATION FOR ADDICTION PROFESSIONALS		ALVIN FELICIANO	\$103,032	0	8/23/2012	Not Filed	\$14,149	\$550
2552	C00413567	NATIONAL ASSOCIATION OF FARM SERVICE AGENCY COUNTY OFFICE EMPLOYEES INC PPC AKA NASCOE PAC		ROBERT L. REDDING, JR.	\$154,216	0	8/8/2012	24	\$33,826	\$680
2553	C00192849	PLUMBERS AND PIPEFITTERS LOCAL UNION 74		MARK R. PERMAR	\$109,945	1	8/2/2012	18	\$15,813	\$250
2556	C00467761	SUE LOWDEN FOR U S SENATE	LOWDEN, SUE	BOB BEERS	\$273,273	2		Not Filed	\$54,655 (est)	\$4,455

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2557	C00507772	SYLVIA ROMO FOR CONGRESS	ROMO, SYLVIA S	LARRY BENSON	\$108,265	0		Not Filed	\$54,133 (est)	\$2,970
2558	C00503342	TOM ENGEL FOR CONGRESS COMMITTEE	ENGEL, TOM	RICHARD VACCARIELLO TIFFANY	\$385,678	0		Not Filed	\$192,839 (est)	\$6,050
2559	C00466011	TRUST WOMEN PAC		REYNOLDS- RICHARDSON	\$175,617	0		Not Filed	\$35,123 (est)	\$990
2560	C00430886	WEBB FOR SENATE	WEBB, JAMES H JR	INGRID MORROY	\$257,207	0		Not Filed	\$51,441 (est)	\$2,970
2561	C00509778	WIELAND 2012	WIELAND, RICHARD E	ROBERT W. MERKLE	\$569,527	0		Not Filed	\$569,527 (est)	\$11,000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2012 )  
July Quarterly Report for the )  
Administrative Fine Program: )  
BICKNELL FOR CONGRESS, and ) AF# 2538  
JAMES R SHAW JR as treasurer; )  
CASS COUNTY REPUBLICAN ) AF# 2539  
CENTRAL COMMITTEE, and TONY P )  
KEY as treasurer; )  
DAVE SITTON FOR CONGRESS, and ) AF# 2540  
DAVID KATSEL as treasurer; )  
DAVID MCINTOSH FOR INDIANA, and ) AF# 2541  
JACKIE M BENNETT JR as treasurer; )  
DEAN YOUNG FOR CONGRESS ) AF# 2542  
COMMITTEE, and HUGH R PARDUE as )  
treasurer; )  
FRIENDS OF CHRIS GARNER, and ) AF# 2543  
BARBARA S SMALL as treasurer; )  
FRIENDS OF HEATHER MCTEER, and ) AF# 2544  
MERCEDES MCTEER as treasurer; )

JIMMIE MOORE FOR CONGRESS, and ) AF# 2547  
CHINN-PRATT, GAIL A. as treasurer; )  
JOHN LEE FOR CONGRESS, and ) AF# 2548  
JUDEN, RYANN PATRICK-SHELL as )  
treasurer; )  
KENNETH SANDERS FOR CONGRESS ) AF# 2549  
CAMPAIGN, and ESQUE SANDERS JR )  
as treasurer; )

NAADAC THE ASSOCIATION FOR ) AF# 2551  
ADDICTION PROFESSIONALS, and )  
ALVIN FELICIANO as treasurer; )

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NATIONAL ASSOCIATION OF FARM ) AF# 2552  
SERVICE AGENCY COUNTY OFFICE )  
EMPLOYEES INC PPC AKA NASCOE )  
PAC, and ROBERT L REDDING JR as )  
treasurer; )  
PLUMBERS AND PIPEFITTERS LOCAL ) AF# 2553  
UNION 74, and MR MARK R PERMAR as )  
treasurer; )

SUE LOWDEN FOR U S SENATE, and ) AF# 2556  
BOB BEERS as treasurer; )  
SYLVIA ROMO FOR CONGRESS, and ) AF# 2557  
LARRY BENSON as treasurer; )  
TOM ENGEL FOR CONGRESS ) AF# 2558  
COMMITTEE, and VACCARIELLO, )  
RICHARD MR. as treasurer; )  
TRUST WOMEN PAC, and REYNOLDS- ) AF# 2559  
RICHARDSON, TIFFANY as treasurer; )  
WEBB FOR SENATE, and INGRID ) AF# 2560  
MORROY as treasurer; )  
WIELAND 2012, and ROBERT W ) AF# 2561  
MERKLE as treasurer; )

CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission, do  
hereby certify that on September 12, 2012 the Commission took the following actions  
on the Reason To Believe Recommendation - 2012 July Quarterly Report for the  
Administrative Fine Program as recommended in the Reports Analysis Division's  
Memorandum dated September 11, 2012, on the following committees:

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AF#2538 Decided by a vote of 6-0 to: (1) find reason to believe that BICKNELL FOR CONGRESS, and JAMES R SHAW JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2539 Decided by a vote of 6-0 to: (1) find reason to believe that CASS COUNTY REPUBLICAN CENTRAL COMMITTEE, and TONY P KEY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Peterson, Walther, and Weintraub voted affirmatively for the decision.

AF#2540 Decided by a vote of 6-0 to: (1) find reason to believe that DAVE SITTON FOR CONGRESS, and DAVID KATSEL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2541 Decided by a vote of 6-0 to: (1) find reason to believe that DAVID MCINTOSH FOR INDIANA, and JACKIE M BENNETT JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2542 Decided by a vote of 6-0 to: (1) find reason to believe that DEAN YOUNG FOR CONGRESS COMMITTEE, and HUGH R PARDUE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2543 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF CHRIS GARNER, and BARBARA S SMALL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2544 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF HEATHER MCTEER, and MERCHDEES MCTEER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2547 Decided by a vote of 6-0 to: (1) find reason to believe that JIMMIE MOORE FOR CONGRESS, and CHINN-PRATT, GAIL A. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2548 Decided by a vote of 6-0 to: (1) find reason to believe that JOHN LEE FOR CONGRESS, and JUDEN, RYANN PATRICK-SHELL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2549 Decided by a vote of 6-0 to: (1) find reason to believe that KENNETH SANDERS FOR CONGRESS CAMPAIGN, and ESQUE SANDERS JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2551 Decided by a vote of 6-0 to: (1) find reason to believe that NAADAC THE ASSOCIATION FOR ADDICTION PROFESSIONALS, and ALVIN FELICIANO as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

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letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2552 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF FARM SERVICE AGENCY COUNTY OFFICE EMPLOYEES INC PPC AKA NASCOE PAC, and ROBERT L REDDING JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2553 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and MR MARK R PERMAR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2556 Decided by a vote of 6-0 to: (1) find reason to believe that SUE LOWDEN FOR U S SENATE, and BOB BEERS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2557 Decided by a vote of 6-0 to: (1) find reason to believe that SYLVIA ROMO FOR CONGRESS, and LARRY BENSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2558 Decided by a vote of 6-0 to: (1) find reason to believe that TOM ENGEL FOR CONGRESS COMMITTEE, and VACCARIELLO, RICHARD MR. as treasurer

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violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2559 Decided by a vote of 6-0 to: (1) find reason to believe that TRUST WOMEN PAC, and REYNOLDS-RICHARDSON, TIFFANY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2560 Decided by a vote of 6-0 to: (1) find reason to believe that WEBB FOR SENATE, and INGRID MORROY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2561 Decided by a vote of 6-0 to: (1) find reason to believe that WIELAND 2012, and ROBERT W MERKLE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

September 13, 2012  
Date

Shelley E. Garr  
Shelley E. Garr  
Deputy Secretary of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 13, 2012

Larry Benson, in official capacity as Treasurer  
Sylvia Romo for Congress  
P.O. Box 781691  
San Antonio, TX 78278

C00507772  
AF#: 2557

Dear Mr. Benson:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period through June 30th, shall be filed no later than July 15th. 2 U.S.C. § 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On September 12, 2012, the FEC found that there is reason to believe ("RTB") that Sylvia Romo for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before July 15th. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2,970. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$2,970 is due within forty (40) days of the finding, or by October 22, 2012, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$54,133  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street,

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NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or October 22, 2012. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

Also "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Sylvia Romo for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

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**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Caroline C. Hunter  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$2,970 for the 2012 July Quarterly Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by October 22, 2012. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Sylvia Romo for Congress

FEC ID#: C00507772

AF#: 2557

PAYMENT DUE DATE: October 22, 2012

PAYMENT AMOUNT DUE: \$2,970

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2012 NOV 26 PM 2: 01

November 26, 2012

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PC for PO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *SP*  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2012 July Quarterly Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2012 July Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

Reports Analysis Division (RAD) recommends that the Commission take no further action against Webb for Senete (AF 2560). At RTB, the Committee appeared to have failed to file the 2012 July Quarterly Report. After RTB, it was determined that the Committee had timely filed the 2012 July Quarterly Report using their previously terminated Committee ID

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number. The Committee subsequently filed the 2012 July Quarterly Report under their current Committee ID number. As such, RAD recommends No Further Action should be taken against the Committee.

For your information, eight (8) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. Of these, seven (7) committees will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding, and one (1) committee will not be assessed a civil money penalty at FD. An overview of each of these cases has been provided below.

Dave Sitton for Congress (AF 2540) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$262,820 (previously estimated to be \$403,582), thus the fine would be lowered from \$9,900 to \$8,800.

Dean Young for Congress Committee (AF 2542) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$7,539 (previously estimated to be \$117,229), thus the fine would be lowered from \$4,950 to \$330.

Friends of Heather McTear (AF 2544) disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$5,051 (previously estimated to be \$134,272), thus the fine would be lowered from \$4,950 to \$330.

Jimmie Moore for Congress (AF 2547) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$942 (previously estimated to be \$82,058), thus the fine would be lowered from \$3,850 to \$250.

John Loe for Congress (AF 2548) filed the 2012 July Quarterly Report after the RTB finding and disclosed no activity (previously estimated to be \$46,103), which would result in no civil money penalty (fine previously assessed to be \$990).

Kenneth Sanders for Congress Campaign (AF 2549) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$31,872 (previously estimated to be \$52,113), thus the fine would be lowered from \$2,970 to \$990.

Tom Engel for Congress Committee (AF 2558) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil

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money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$92,641 (previously estimated to be \$192,839), thus the fine would be lowered from \$6,050 to \$3,850.

Trust Women PAC (AF 2559) filed the 2012 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$20,446 (previously estimated to be \$35,123), thus the fine would be lowered from \$990 to \$550.

In addition, one (1) committee detailed below designated a new Treasurer after the RTB finding:

- Trust Women PAC (AF 2559) filed an Amended Statement of Organization after the RTB finding designating Amber Lockner as Treasurer (see second list).

#### **RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Make final determination that the political committees and their treasurers listed on the attached reports with no activity, violated 2 U.S.C. § 434(a) and will not be assessed a civil money penalty.
- (3) Take no further action in AF# 2560 that Webb for Senate and Ingrid Morroy, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and close the file.
- (4) Send the appropriate letters.

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1/26/2012 11:57 AM

Federal Election Commission  
FD Circulation Report Fine Paid  
2012 JULY QUARTERLY Not Election Sensitive 07/15/2012 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2538	BICKNELL FOR CONGRESS CASS COUNTY REPUBLICAN CENTRAL COMMITTEE	BICKNELL, HUNTER	C00508285	JAMES R. SHAW, JR.	08/03/2012	18	\$34,201	0	08/12/2012	\$580	\$580	10/22/2012	\$580
2539	MADISON PAC FOR CONSTITUTIONAL LIMITED GOVERNMENT	MCINTOSH, DAVID MARTIN	C00020453	TONY P. KEY	08/09/2012	25	\$8,064	1	08/12/2012	\$225	\$225	09/19/2012	\$225
2541	NATIONAL ASSOCIATION OF FARM SERVICE AGENCY COUNTY OFFICE EMPLOYEES INC PPC AKA NASCIDE PAC		C00500173	JACKIE M. BENNETT, JR.	07/31/2012	16	\$575,917	0	09/12/2012	\$8,500	\$8,500	10/2/2012	\$8,500
2552	PLUMBERS AND PIPEFITTERS LOCAL UNION		C00413567	ROBERT L. REDDING, JR.	08/08/2012	24	\$33,828	0	09/12/2012	\$680	\$680	10/10/2012	\$680
2553			C00192849	MARK R. PERMAR	08/02/2012	18	\$15,813	1	08/12/2012	\$250	\$250	10/22/2012	\$250

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Federal Election Commission  
FD Circulation Report Fine Not Paid  
2012 JULY QUARTERLY Not Election Sensitive 07/15/2012 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2540	DAVE SITTON FOR CONGRESS	SITTON, DAVE	C00511311	DAVID KATSEL	10/02/2012	Not Filed	\$282,820	0	09/12/2012	\$9,900	75	\$8,800
2542	DEAN YOUNG FOR CONGRESS COMMITTEE	YOUNG, LARRY DEAN JR	C00501072	HUGH PARDUE, JR.	10/05/2012	Not Filed	\$7,539	0	09/12/2012	\$4,950	75	\$330
2544	FRIENDS OF HEATHER MCTEER	MCTEER, HEATHER	C00495119	MERCIDEES MCTEER		Not Filed	\$5,051	0	09/12/2012	\$4,950	75	\$330
2547	JIMMIE MOORE FOR CONGRESS	MOORE, JIMMIE SEE	C00497644	GAIL A. CHINN-PRATT	10/09/2012	Not Filed	\$942	0	09/12/2012	\$3,850	75	\$250
2548	JOHN LEE FOR CONGRESS	LEE, JOHN JAY	C00500827	RYANN PATRICK-SHELL	10/15/2012	Not Filed	\$0	0	09/12/2012	\$980	75	NONE
2549	KENNETH SANDERS FOR CONGRESS CAMPAIGN	SANDERS, KENNETH	C00514489	ESQUE SANDERS, JR.	10/18/2012	Not Filed	\$31,872	0	09/12/2012	\$2,970	75	\$980
2557	SYLVIA ROMO FOR CONGRESS	ROMO, SYLVIA S	C00507772	LARRY BENSON	11/14/2012	Not Filed	\$81,104	0	09/12/2012	\$2,970	75	\$2,970
2558	TOM ENGEL FOR CONGRESS COMMITTEE	ENGEL, TOM	C00503342	RICHARD VACCARIELLO	10/03/2012	Not Filed	\$92,841	0	09/12/2012	\$6,050	75	\$3,850
2559	TRUST WOMEN PAC		C00468011	AMBER LOCKNER	09/24/2012	Not Filed	\$20,448	0	09/12/2012	\$980	75	\$550

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fines Program - Final )  
Determination Recommendation for the )  
2012 July Quarterly Report: )  
BICKNELL FOR CONGRESS, and ) AF# 2538  
JAMES R SHAW JR as treasurer; )  
CASS COUNTY REPUBLICAN ) AF# 2539  
CENTRAL COMMITTEE, and TONY P )  
KEY as treasurer; )  
DAVE SITTON FOR CONGRESS, and ) AF# 2540  
DAVID KATSEL as treasurer; )  
MADISON PAC FOR CONSTITUTIONAL ) AF# 2541  
LIMITED GOVERNMENT, and )  
BENNETT, JACKIE M JR. as treasurer; )  
DEAN YOUNG FOR CONGRESS ) AF# 2542  
COMMITTEE, and PARDUE, HUGH MR. )  
JR. as treasurer; )  
FRIENDS OF HEATHER MCTEER, and ) AF# 2544  
MERCIDEES MCTEER as treasurer; )  
  
JIMMIE MOORE FOR CONGRESS, and ) AF# 2547  
CHINN-PRATT, GAIL A. as treasurer; )  
JOHN LEE FOR CONGRESS, and ) AF# 2548  
JUDEN, RYANN PATRICK-SHELL as )  
treasurer; )  
KENNETH SANDERS FOR CONGRESS ) AF# 2549  
CAMPAIGN, and ESQUE SANDERS JR )  
as treasurer; )  
  
NATIONAL ASSOCIATION OF FARM ) AF# 2552  
SERVICE AGENCY COUNTY OFFICE )  
EMPLOYEES INC PPC AKA NASCOE )  
PAC, and ROBERT L REDDING JR as )  
treasurer; )  
PLUMBERS AND PIPEFITTERS LOCAL ) AF# 2553  
UNION 74, and MR MARK R PERMAR as )  
treasurer; )

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SYLVIA ROMO FOR CONGRESS, and	)	AF# 2557
LARRY BENSON as treasurer;	)	
TOM ENGEL FOR CONGRESS	)	AF# 2558
COMMITTEE, and VACCARIELLO,	)	
RICHARD MR. as treasurer;	)	
TRUST WOMEN PAC, and AMBER	)	AF# 2559
LOCKNER as treasurer;	)	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on November 27, 2012 the Commission took the following actions on the Administrative Fines Program - Final Determination Recommendation for the 2012 July Quarterly Report as recommended in the Reports Analysis Division's Memorandum dated November 26, 2012, on the following committees:

AF#2538 Decided by a vote of 6-0 to: (1) make a final determination that BICKNELL FOR CONGRESS, and JAMES R SHAW JR as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2539 Decided by a vote of 6-0 to: (1) make a final determination that CASS COUNTY REPUBLICAN CENTRAL COMMITTEE, and TONY P KEY as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2540 Decided by a vote of 6-0 to: (1) make a final determination that DAVE SITTON FOR CONGRESS, and DAVID KATSEL as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2541 Decided by a vote of 6-0 to: (1) make a final determination that MADISON PAC FOR CONSTITUTIONAL LIMITED GOVERNMENT, and BENNETT, JACKIE M JR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2542 Decided by a vote of 6-0 to: (1) make a final determination that DEAN YOUNG FOR CONGRESS COMMITTEE, and PARDUE, HUGH MR. JR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2544 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF HEATHER MCTEER, and MERCIDEES MCTEER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2547 Decided by a vote of 6-0 to: (1) make a final determination that JIMMIE MOORE FOR CONGRESS, and CHINN-PRATT, GAIL A. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2548 Decided by a vote of 6-0 to: (1) make a final determination that JOHN LEE FOR CONGRESS, and JUDEN, RYANN PATRICK-SHELL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2549 Decided by a vote of 6-0 to: (1) make a final determination that KENNETH SANDERS FOR CONGRESS CAMPAIGN, and ESQUE SANDERS JR as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2552 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL ASSOCIATION OF FARM SERVICE AGENCY COUNTY OFFICE EMPLOYEES INC PPC AKA NASCOE PAC, and ROBERT L REDDING JR as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2553 Decided by a vote of 6-0 to: (1) make a final determination that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and MR MARK R PERMAR as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2557 Decided by a vote of 6-0 to: (1) make a final determination that SYLVIA ROMO FOR CONGRESS, and LARRY BENSON as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2558 Decided by a vote of 6-0 to: (1) make a final determination that TOM ENGEL FOR CONGRESS COMMITTEE, and VACCARIELLO, RICHARD MR. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2559 Decided by a vote of 6-0 to: (1) make a final determination that TRUST WOMEN PAC, and AMBER LOCKNER as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Federal Election Commission  
Certification for Administrative Fines  
November 27, 2012

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Attest:

November 28, 2012  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 28, 2012

Larry Benson, in official capacity as Treasurer  
Sylvia Romo for Congress  
P.O. Box 781691  
San Antonio, TX 78278

C00507772  
AF#: 2557

Dear Mr. Benson:

On September 12, 2012, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Sylvia Romo for Congress and its treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2012 July Quarterly Report. By letter dated September 13, 2012, the Commission sent notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$2,970 in accordance with the schedule of penalties at 11 CFR § 111.43. Within 40 days of the FEC's RTB finding, its treasurer was required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty. The amount of the level of activity has been changed to reflect the actual level of activity of the 2012 July Quarterly Report.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on November 27, 2012 that you, in your official capacity as treasurer, and Sylvia Romo for Congress violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$2,970 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$81,104

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or treasurer reside, or transact business, requesting that the final

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determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g, 11 C.F.R. § 111.38.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

## **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Sari Pickerall at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

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On behalf of the Commission,

*Caroi C. Hunter*

Caroline C. Hunter  
Chair

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$2,970 for the 2012 July Quarterly Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

**Payments by Personal Check**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Sylvia Romo for Congress

FEC ID#: C00507772

REPORT: 2012 July Quarterly

AF#: 2557

PAYMENT AMOUNT DUE: \$2,970

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FOR: Sylvia Romo for Congress

FEC ID#: C00507772

REPORT: 2012 July Quarterly

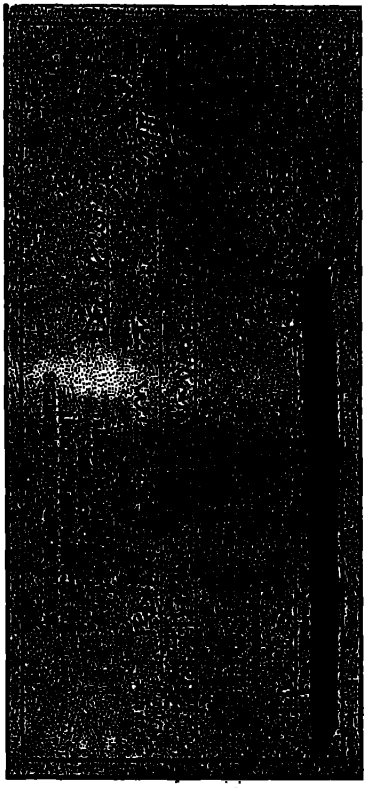
AF#: 2557

PAYMENT AMOUNT DUE: \$2,970

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058    Ledger Date 12/11/2012

**usbank.**  
St. Louis GA Lockbox  
(314) 425-1818



Batch	Item	TID	Batch Total	Amount
1	1	Y-3003705	\$2,970.00	\$2,970.00



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2557

DATE SCANNED

2/13/13

SCANNER NO.

2

SCAN OPERATOR

EES

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